

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking on the
Commission's Own Motion into the
Service Quality Standards for All
Telecommunications Carriers and Revision
to General Order 133-B.

R. 02-12-004

**COMMENTS OF
CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC.,
D/B/A FRONTIER COMMUNICATIONS OF CALIFORNIA**

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May 14, 2007

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I. INTRODUCTION

Pursuant to the Administrative Commissioner's Ruling and Scoping Memo issued March 30, 2007 and subsequent Ruling issued April 12, 2007 seeking comments on R. 02-12-004, Citizens Telecommunications Company of California Inc. d/b/a Frontier Communications of California (U 1024 C) ("Frontier") provides these comments. It is appropriate for the Commission to examine service quality rules under General Order 133-B (G.O. 133-B) in light of today's environment of the Uniform Regulatory Framework and competition among providers of telecommunications services. At the outset, Frontier believes that G.O.133-B rules are not needed in a competitive environment and that the Commission should seriously consider elimination, or at a minimum, reduction of service quality requirements for competitive providers. Frontier believes that the Commission could review existing FCC ARMIS reports to monitor company-specific service quality. However, if the Commission determines that an additional level of review is still required, Frontier supports the use of third party customer satisfaction surveys.

II. RESPONSES TO QUESTIONS POSED IN RULING AND SCOPING MEMO

Below are Frontier's responses to the four (4) specific topics raised in the March 30, 2007

Ruling. Certain portions of the questions and issues raised in the March 30th Ruling are included for reference.

Topic # 1: "Annual customer satisfaction surveys for all wireline and wireless services. If so, should the surveys focus on installation, repair and answering time or are there other relevant metrics that should be included? Should the surveys follow the ARMIS format for wireline carriers or should surveys be developed for wireline and wireless carriers? If surveys are developed, what questions should be included? Should the requirement to complete customer satisfaction surveys have a threshold determined by access lines and/or active numbers? How should the surveys be conducted? How should carriers transmit data to Commission staff for publishing on the Commission's website?"

Frontier's Comments: Frontier supports the elimination of G.O. 133-B service quality requirements and the use of FCC ARMIS reports already prepared by LECS as the replacement service quality reporting requirement applicable to all carriers. The ARMIS reports contain significant information that the Commission may utilize to monitor service quality. To the extent the Commission requires additional service quality data beyond the ARMIS reports, Frontier supports the concept of customer satisfaction surveys to monitor the quality of service offered by all wireline and wireless carriers. The customer satisfaction survey should be well prepared, market based, cost effective, performed and analyzed objectively, and applied consistently. While Frontier believes that a neutral third party should conduct the surveys, Frontier supports the use of workshops to allow input by carriers and other parties to develop surveys that are used for all telecommunications consumers. In addition, if a service quality customer satisfaction survey is implemented then the survey should be combined with other surveys (such as in the URF Phase II docket R. 05-04-005) the Commission may have or is contemplating in other proceedings.

Topic # 2: “URF service quality monitoring of existing California specific ARMIS and MCOT measures. Should non-URF ILECs have the same reporting requirement? Should CLECs have the same reporting requirement? Should the Commission continue to monitor service quality under the MCOT requirements?”

Frontier’s Comments: As noted above, Frontier does not support increased service quality reporting and monitoring requirements and encourages the Commission to utilize existing ARMIS reports to monitor service quality. In addition, to the extent the Commission moves to a third party survey approach then it should be applied to all carriers offering service in California.

Topic # 3: “Service quality monitoring of major service interruptions or California-specific downtime under ARMIS. Should all LECs report service quality interruptions in the same manner?”

Frontier’s Comments: Currently, California carriers are subject to major service interruption (MSI) reporting based on the Commission’s guidelines issued in 1977. As part of its annual Eligible Telecommunications Certification (ETC) filing with the Commission, Frontier also complies with the service interruption requirements set forth by the FCC 05-46 Report and Order adopted on February 25, 2005. Frontier supports continued reporting of MSIs in order to meet existing ETC requirements but believes it would be beneficial for the Commission to adopt the FCC standards for state reporting. This approach eliminates the need for carriers to monitor and report MSIs under two different standards. Furthermore, the existing Commission guidelines are based on an obscure 1977 memorandum, as opposed to a formal general order, decision or ruling. MSI reporting should be equally applicable to all carriers.

Topic # 4: “Elimination or continuation of existing company-specific or California-specific measures and/or reports. Should whether the measures or reports provide consumers or the Commission with relevant information on the performance of a carrier govern whether measures and/or reports should be continued or eliminated? Explain your reasons for eliminating or continuing each measure and/or report.

Frontier's Comments: All existing General Order 133-B requirements should be eliminated.

The existing consumer protection measures provide a means for the Commission to determine if service problems exist. Further, existing FCC ARMIS reports provide service level statistics that the Commission may utilize to monitor service quality. Continuation of the General Order 133-B requirements reporting is duplicative and not necessary. In a competitive environment, carriers like Frontier must provide high quality service to compete. Consequently, the market and not regulatory requirements acts as the means for carriers to strive for high service quality.

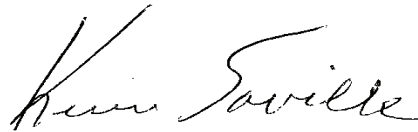
III. CONCLUSION

Frontier supports the elimination of the existing General Order 133-B service quality requirements and is open to further consideration of customer satisfaction surveys to replace the existing service quality standards and reporting requirements. In light of the competition in communications, the combination of using existing FCC ARMIS reports and customer satisfaction surveys will provide the Commission with sufficient information to monitor service quality in California.

Dated May 14, 2007

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC.
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CERTIFICATE OF SERVICE

I, Barbara Matson, hereby certify that on this day I served a copy of the COMMENTS of

CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC.,
D/B/A FRONTIER COMMUNICATIONS OF CALIFORNIA

to all parties on the CPUC's service list for R. 02-12-004. I true and correct Adobe Acrobat PDF copy was E-mailed to those parties on the service list who provided an E-mail address. For those parties who have not provided the Commission an electronic address, paper copies were provided via U.S. Mail.

Dated at Mound, Minnesota, this 14th day of May 2007.

A handwritten signature in cursive script, appearing to read 'Barbara Matson', written in black ink.

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